

## EXHIBIT B

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1           **UNITED STATES DISTRICT COURT**

2           **NORTHERN DISTRICT OF CALIFORNIA**

3           ANIBAL RODRIGUEZ, JULIEANNA  
4           MUNIZ, ELIZA CAMBAY, SAL CATALDO,  
5           EMIR GOENAGA, JULIAN SANTIAGO,  
6           HAROLD NYANJOM, KELLIE NYANJOM,  
7           and SUSAN LYNN HARVEY, individually  
8           and on behalf of all other similarly situated,

9           Plaintiffs,

10          vs.

11          GOOGLE LLC

12          Defendants.

13          **WILLKIE FARR & GALLAGHER LLP**

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2          *Attorneys for Defendant Google LLC*

3          Case No. 3:20-cv-4688-RS

4          **JOINT STIPULATION AND [PROPOSED]  
5           ORDER TO CONTINUE DISCOVERY  
6           DEADLINES**

7          Judge: Hon. Richard Seeborg

1 Pursuant to Civil Local Rules 6-2 and 7-12, this joint stipulation is entered into by and  
 2 between Plaintiffs Anibal Rodriguez, et al and Defendant Google LLC (collectively, the "Parties").

3 WHEREAS, the parties have been working to complete discovery in this case pursuant to  
 4 the Court's deadlines, and

5 WHEREAS, ~~given the complexity of pleadings have not yet been settled, and~~

6 ~~WHEREAS, the case and the amount of discovery that remains in the case, the parties agree~~  
 7 ~~to an extension of the schedule allows for some flexibility in the~~ fact discovery ~~deadline~~ and expert  
 8 disclosure ~~date~~ deadlines without moving any other deadlines in the case, and

9 WHEREAS, ~~given the possibility that~~ the scope of discovery may change depending on the  
 10 Court's ruling on Google's pending motion to dismiss (Dkt. 115) ~~the parties agree to negotiate a~~  
 11 ~~second extension as needed after the Court has issued an order on the pending motion to dismiss.~~  
 12 115, and

13 WHEREAS, the parties agree to negotiate in good faith whether and to what extent a second  
 14 extension may be needed after the Court has issued an order on the pending motion to dismiss, and

15 WHEREAS, there have been no other extensions of the case schedule set by the Court;

16 NOW THEREFORE, the parties agree to the following:

- 17 • The parties agree to extend the fact discovery deadline (Dkt. 59) by 60 days to January  
   11, 2022.
- 19 • The parties agree to extend the expert disclosure date, which is currently set on December  
   13, 2021 (Dtk. 59), to January 11, 2022, to match the new discovery deadline.
- 21 • After the Court has issued an order on the pending motion to dismiss, the parties agree  
   to ~~negotiate all~~meet and confer regarding other deadlines as needed.

23 DATED: August 4, 2021

24 By: /s/ Draft

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DATED: August 3, 2021

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, JULIEANNA MUNIZ, ELIZA CAMBAY, SAL CATALDO, EMIR GOENAGA, JULIAN SANTIAGO, HAROLD NYANJOM, KELLIE NYANJOM, and SUSAN LYNN HARVEY, individually and on behalf of all other similarly situated,

Case No. 3:20-cv-4688-RS

## [PROPOSED] ORDER

## Plaintiffs,

VS.

GOOGLE LLC

## Defendants

Pursuant to stipulation of the Parties, the Court hereby **ORDERS** that the discovery deadline and expert disclosure deadline are extended until January 11, 2022.

## **IT IS SO ORDERED.**

Dated:

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The Honorable Richard Seeborg